

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Deanna Michelle Bentley as Power of Attorney for Deanna Dix Bentley,)	
)	Case No.: 2:21-cv-2350-RMG
Plaintiff,)	
vs.)	<u>CONSENT AMENDED</u>
)	<u>SCHEDULING ORDER</u>
Total Renal Care Inc. d/b/a Jedburg Dialysis,)	
)	
Defendants.)	

The Court amends the Conference and Scheduling Order filed on **August 02, 2021** as follows:

1. Rule 26(a)(1) Initial Disclosures: No later than **September 07, 2021** the required initial disclosures under Fed. R. Civ. P. 26(a)(1) shall be made.
2. Rule 26(f) Report: No later than **September 07, 2021**, the parties shall file a Fed. R. Civ. P. 26(f) Report.
3. Mediation: Mediation shall be completed in this case on or before **December 21, 2021**.¹
4. Amendment of Pleadings: Motions to join other parties and amend the pleadings shall be filed no later than **November 01, 2021**.
5. Expert Witnesses: Parties shall file and serve a document identifying by full name, address, and telephone number each person whom they expect to call as an expert at trial and certifying that a written report prepared and signed by the expert including all information required by Feder. R. Civ. P. 26(a)(2)(B) has been disclosed to the parties by the following dates:
 Plaintiff: **January 31, 2022**
 Defendant: **March 31, 2022**
6. Records Custodian Witnesses: Counsel shall file and serve affidavits of records custodian witnesses proposed to be present by affidavit at trial no later than **January 06, 2022**. Objection to such affidavits must be made within fourteen (14) days after the service of the disclosure. (See Fed. R. Evid. 803(6), 902(11), or 902(12) and Local Civil rule 16.02(D)(3)).
7. Discovery: Discovery shall be completed no later than **January 31, 2022**. All discovery

¹ Parties shall file the form entitled “Mediation of Cases Pending Before Judge Gergel.”

requested shall be served in time for the responses thereto to be served by this deadline. De bene esse depositions must be completed by discovery deadline. No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02.

8. Motions in Limine: Motions in limine must be filed no later than **fifteen (15) business days prior to jury selection**.
9. Dispositive Motions and Daubert Motions: All dispositive motions and Daubert motions shall be filed on or before **February 14, 2022**.
10. Pretrial Disclosures: No later than **twenty-one (21) business days prior to jury selection**, the parties shall file and exchange Fed. R. Civ. P. (26)(a)(3) pretrial disclosures. Within fourteen (14) days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party and any deposition counter-designations under Fed. R. Civ. P. 32(a)(4).
11. Pretrial Briefs: Parties shall furnish the Court and serve pretrial briefs **five (5) business days prior to the date set for jury selection** (Local Civil Rule 26.05). Attorneys shall meet at least five (5) business days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. See Local Civil Rule 26.07.
12. Trial: This case is subject to be called for jury selection and/or trial on or after **May 01, 2022**.

Richard Mark Gergel
United States District Judge

August __, 2021
Charleston, South Carolina

WE SO CONSENT:

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